

LAW OFFICE OF RESHMA KAMATH

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Counsel for PLAINTIFF MARTIN ENG LEE

**IN AND FOR THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

MARTIN ENG LEE,

Plaintiff,

v.

LEGAL RECOVERY LLC, a California
limited liability company; DEMAS YAN, AN
INDIVIDUAL; CHEUK YAN, AN
INDIVIDUAL, SAN FRANCISCO
SHERIFF'S DEPARTMENT, a government
entity; DAVID CAIMOTTO, AN
INDIVIDUAL, and DOES 1-10, inclusive,

Defendants.

Case No.: **3:24-cv-03628**

**PLAINTIFF'S REQUEST FOR A
CONFLICTS-CHECK AGAINST
MAGISTRATE JUDGE ALEX G. TSE.**

***TO THE HONORABLE COURT; PARTIES; AND, ALL ATTORNEYS OF RECORD,
HEREIN:***

PLAINTIFF’S REQUEST FOR A CONFLICTS-CHECK
AGAINST MAGISTRATE JUDGE ALEX G. TSE.

PLEASE TAKE NOTICE that PLAINTIFF’s undersigned counsel wants to perform a conflicts-check against MAGISTRATE JUDGE ALEX G. TSE. Even though, JUDGE TSE has re-assigned this case to a district court judge, MAGISTRATE JUDGE TSE, as a judicial officer of the court, is answerable to the litigants in this case, the counsel and the public.

The questions that JUDGE TSE must answer, even if he has re-assigned this case, are as follows:

- Does JUDGE ALEX G. TSE know Defendant DEMAS YAN, or DENNIS YAN, a disbarred attorney?
- Has JUDGE ALEX G. TSE met Defendant DEMAS YAN, or DENNIS YAN, ever?
- Has JUDGE ALEX G. TSE talked to Defendant DEMAS YAN, or DENNIS YAN, ever?
- Has JUDGE ALEX G. TSE met Defendant DEMAS YAN, or DENNIS YAN, at any bar association event?
- Has JUDGE ALEX G. TSE met Defendant DEMAS YAN, or DENNIS YAN, at any Chinese bar association event?
- Has JUDGE ALEX G. TSE met Defendant DEMAS YAN, or DENNIS YAN, at any Taiwanese bar association event?
- Does JUDGE ALEX G. TSE’s spouse know Defendant DEMAS YAN, or DENNIS YAN?
- Does JUDGE ALEX G. TSE’s spouse know Defendant DEMAS YAN’s spouse?
- When JUDGE ALEX G. TSE was an attorney did he ever know or talk to Defendant DEMAS YAN?
- For each of the above questions, did JUDGE ALEX G. TSE do the same with any of the other defendants particularly,

- 1 - During and after the commencement of this case, has JUDGE ALEX G. TSE talked to any of the
2 Defendants' agents, TINA FOON YAN, BRIAN FU, TONY FU, DUY THAI and/or anyone
3 related to these individuals, as in how Dennis Yan appeared as agent for certain other
4 Defendants?

5 MAGISTRATE JUDGE ALEX TSE must answer such and related questions before this
6 case goes on with DISTRICT JUDGE ORRICK.

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8 **DATED: July 29, 2024**

LAW OFFICE OF RESHMA KAMATH

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10 **RESHMA KAMATH,**
11 Counsel for PLAINTIFF,
12 MARTIN ENG LEE
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